

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
V.	)	NO. 04-10274-PBS
	)	
TONY DIAZ	)	
_____	)	

DEFENDANT'S MOTION FOR CRIMINAL  
RECORDS OF CIVILIAN WITNESSES

The defendant, Tony Diaz, respectfully moves that this Court order the Government to provide the defendant with the criminal records of any potential civilian witness whom may be called at trial. On September 14, 2005, undersigned counsel sent a letter to the prosecutor requesting the probation records of the civilian witnesses. After speaking to the prosecutor, undersigned counsel agreed to amend the request to only the criminal records. The prosecutor agreed to provide the records.

Trial in this matter is scheduled to begin on October 31, 2005. In order to be prepared for trial, the defendant requires the criminal records of the witnesses as soon as possible.

WHEREFORE, the defendant's motion should be allowed and the government should provide the criminal records of any civilian witness it may call at trial to the defendant immediately.

Tony Diaz  
By His Attorneys

CARNEY & BASSIL

/s/Andrew D'Angelo

Andrew M. D'Angelo  
B.B.O. # 564200  
CARNEY & BASSIL  
20 Park Plaza, Suite 1405  
Boston, MA 02116  
617-338-5566  
adangelo@CarneyBassil.com

Dated: October 18, 2005